

Remarks

The various parts of the Office Action (and other matters, if any) are discussed below under appropriate headings.

Amendments

Claim 1 has been amended to include the limitations of claim 7. Claim 7 has been canceled. Withdrawn claims 24-28 have been canceled. And claim 33 has been rewritten in independent form.

Interview Request

An interview request is being submitted concurrently. The undersigned respectfully requests a telephone interview at the Examiner's earliest convenience. The undersigned suggests 11:00 a.m. on May 30, 2007 for the interview.

Claim Rejections - 35 USC § 102 and § 103

A. Claim 10 stands rejected under 35 U.S.C. §102(a) and (e) as being anticipated by Harding (U.S. Patent No. 6,756,096). Unlike claim 10, however, Harding fails to disclose a system with two or more stacks of fan-folded sheet stock material proximate a Dunnage converter, where the stacks are connected together in series.

In contrast, Harding discloses splicing a single stack of stock material to a trailing end of a supply of stock material already fed into the converter. The stock material that is in the converter is no longer a stack. At no times does Harding appear to disclose splicing multiple stacks of stock material together. Consequently, claim 10 does not appear to be anticipated by Harding.

B. Claims 1-23 and 29-34 stand rejected under 35 U.S.C. §103(a) as being obvious in view of Harding and/or a combination of Beduhn (U.S. Patent No. 6,673,185), Simmons '173 (U.S. Patent No. 5,387,173), Simmons '454 (U.S. Patent No. 6,095,454), Slaters (U.S. Patent No. 6,068,125), and/or Crowley (U.S. Patent No. 6,027,298). The specific rejections made by the Examiner are addressed in order in the following paragraphs.

- 1) First, the Examiner took Official Notice that it is well known in the art to position stacks horizontally or vertically (Office Action p. 3). But the Examiner did not state why the person of ordinary skill in the art would modify Harding to provide stacks horizontally or vertically, however, which makes the rejection improper. I respectfully submit that the skilled person would not, and in fact did not provide multiple stacks of fan-fold stock material in Harding. Withdrawal of the rejection of claim 10 is requested.
- 2) Second, the Examiner took the position that it would have been obvious to connect multiple stacks of sheet stock material for feeding into the conversion machine disclosed in Simmons '173 in view of Beduhn or Harding to avoid reloading each stack and the associated downtime (Office Action p. 4). Simmons '173 implies that multiple stacks should not be fed into the converter, however. Simmons '173 states that a box of fan-fold stock material should be palletized for storage and/or transportation, not for feeding into a converter. Thus, Simmons '173 appears to teach away from Beduhn. And as noted above, Harding does not teach or suggest splicing multiple stacks together. Withdrawal of the rejection of claims 10-14, 16-20, and 29 is requested.
- 3) Next, the Examiner took the position that it would have been obvious to load Ratzel's converter with stock material provided by either Harding or Beduhn to provide a continuous converting process (Office Action, pp. 5-6). Ratzel discloses a dunnage converter, but fails to disclose a supply of stock material having more than one stack. Harding still does not teach or suggest splicing multiple stacks together. Instead, Harding suggests simply splicing a new supply of stock material to an almost-spent supply before the almost-spent supply runs out. Consequently, no combination of Ratzel and Harding could result in the invention claimed in claims 1-16, 18, 19 and 29-32.
With regard to the combination of Ratzel and Beduhn, no teaching or suggestion has been found for simultaneously feeding multiple plies of Beduhn's industrial stock material into Ratzel's converter. Without some reason for doing so, it is respectfully submitted that the skilled person would not have done so. Withdrawal of the rejection of claims 1-16, 18, 19 and 29-32 is respectfully requested.
- 4) The Examiner also took the position that it would have been obvious to include the cart disclosed in Simmons '454 in a modified system of Ratzel in view of Beduhn or Harding to supply multiple stacks of stock material to a converter (Office

Action, p. 6). The teachings of a reference must be considered in its entirety, and Simmons '454 discloses a stock roll storage rack that enables an operator to load a stock roll onto a conversion machine without lifting the stock roll but simply rolling it into position. It is respectfully submitted that a stack of stock material will not roll or slide as easily as a roll of stock material will roll. Consequently, the problems addressed in Simmons '454 do not appear to be relevant to the system of claims 33 and 34. It is further submitted that there is no reason a person of ordinary skill in the art would consider using the cart of Simmons '454 with multiple stacks of fan-fold stock material. Withdrawal of the rejection of claims 33 and 34 is requested.

5) The Examiner then took the position that it would have been obvious in view of Simmons '173 in view of Beduhn and further in view of Crowley to palletize stacks of fan-fold stock material to store a supply of stock material (Office Action, p. 7). Crowley does disclose a cart for storing or transporting folded forms. The cart has a plurality of storage locations, each of which can be provided with a stack. Crowley does not appear to teach or suggest connecting any of the stacks, however, and it appears that no provision is made for making connections between stacks in different storage locations. Accordingly, it does not appear that Beduhn's connected stock material could be used in Crowley's cart. Withdrawal of the rejection of claims 20, 22, and 23 is respectfully requested.

6) Finally, the Examiner took the position that it would have been obvious to palletize stacks of fan-fold material according to Slaters in the system of Simmons '173 to store a supply of stock material. Slaters discloses stacks of fan folded planar container carriers. First, it is unclear how Slaters is relevant to the dunnage conversion art. Slaters dispenses a product component, carriers, that are not converted into a dunnage product. Second, Beduhn already discloses a fan-folded material, so Slaters does not appear to add anything to the combination. It is respectfully submitted that the ordinary skilled person would not be motivated to consider Slaters, and would not motivate the skilled person to provide such a fan folded material to Simmons '173s dunnage converter. Withdrawal of the rejection is respectfully requested.

Conclusion

In view of the foregoing, withdrawal of the rejections is respectfully requested.

Respectfully submitted,

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Date: May 22, 2007

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